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*Attorneys for Defendant Sierra Cedars Condominium Homeowners Association*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,  
Plaintiff,

v.

SIERRA CEDARS CONDOMINIUM  
HOMEOWNERS ASSOCIATION; LVDG  
SERIES 200, LLC; THUNDER  
PROPERTIES, INC.; HAMPTON &  
HAMPTON COLLECTIONS, LLC,  
Defendants.

CASE NO.: 3:16-cv-00127-HDM-WGC

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO BANK  
OF AMERICA, N.A.'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT [ECF  
No. 55]  
(FOURTH REQUEST)**

COME NOW Plaintiff, Bank of America, N.A., and Defendants, Thunder Properties, Inc. and LVDG, LLC [Series 200]; Sierra Cedars Condominium Homeowners Association; and Hampton & Hampton Collections, LLC, by and through their undersigned counsel, hereby stipulate and agree as follows:

1. On March 21, 2018, Plaintiff filed a Motion for Partial Summary Judgment [ECF No. 55].

2. On April 9, 2018, the parties submitted a stipulation extending the deadline to respond to said Motion for Summary Judgment until April 25, 2018 [ECF No. 58]. Said stipulation was approved on April 10, 2018 [ECF No. 59].

1           3.     On April 24, 2018, the parties submitted a second stipulation extending  
2 the deadline to respond to said Motion for Summary Judgment until May 28, 2018 [ECF  
3 No. 61]. Said Stipulation was approved on April 24, 2018 [ECF No. 62].

4           4.     On May 30, 2018, the parties submitted a third stipulation to extend time  
5 to respond to Bank of America, N.A.'s Motion for Partial Summary Judgment until June  
6 12, 2018 [ECF No. 65]. Said Stipulation was approved on May 30, 2018 [ECF No. 66].

7           5.     The parties have entered into settlement negotiations that are very close  
8 to resolving this matter. The parties have exchanged joint settlement offers and there is  
9 currently an offer that is pending recommended approval.

10          6.     Based on the foregoing, Defendants have requested and shall be granted  
11 an extension of time for two (2) weeks, until Tuesday, June 26, 2018, to respond to  
12 Plaintiff's Motion for Partial Summary Judgment.

13          7.     The parties certify that this Stipulation is made in good faith and the  
14 extension is not sought for the purpose of undue delay or to cause prejudice to any  
15 party.

16 DATED this 12<sup>th</sup> day of June, 2018

DATED this 12<sup>th</sup> day of June, 2018.

17 AKERMAN, LLP

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18 /s/ Vatana Lay

/s/ David A. Clark

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Sierra Cedars Condominium Homeowners  
Association

1 DATED this 12<sup>th</sup> day of June, 2018

DATED this 12<sup>th</sup> day of June, 2018.

2 ROGER P. CROTEAU &  
3 ASSOCIATES, LTD

NEVADA ASSOCIATION SERVICES, INC.

4 /s/ Timothy E. Rhoda

/s/ Brandon E. Wood

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Thunder Properties, Inc.

Hampton & Hampton Collections, LLC

8 and LVDG, LLC [Series 200]

9  
10 Case No. 3:16-cv-00127-HDM-WGC  
11 STIPULATION AND ORDER TO EXTEND TIME TO RESPOND  
12 TO MOTION FOR PARTIAL SUMMARY JUDGMENT (Fourth Request)  
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15 IT IS SO ORDERED.

16 DATED: June 12, 2018

17 By: 

18 UNITED STATES DISTRICT COURT JUDGE  
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